



DEPARTMENT OF THE NAVY  
NAVAL FACILITIES ENGINEERING COMMAND  
ATLANTIC  
6506 HAMPTON BLVD  
NORFOLK VA 23508-1278

3/7/07-02635

TELEPHONE NO:

IN REPLY REFER TO:

March 07, 2007

Ms. Evelyn Rodríguez Cintron  
Manager, Air Quality Area  
Puerto Rico Environmental Quality Board  
Piso 5 Ave. Ponce de León #1308  
Carr Estatal 8838  
Sector El Cinco  
Rio Piedras, PR 00926

Re: Letter from EQB to the Navy dated August 03, 2006 regarding the operation of the flashing furnace for the Time Critical Munitions Removal Action on Vieques, Puerto Rico

Dear Ms.Cintron :

Attached for your review is the Navy's response to the comments in your letter dated August 03, 2006 regarding the operation of the flashing furnace on the former Vieques Naval Training Range as part of the Time Critical Munitions Removal Action for the former Live Impact Area on Vieques, Puerto Rico.

The responses to your comments will be incorporated into the *Final Work Plan and Site Safety Plan for the Central Processing Center and MEC Support Activities at the Former Vieques Naval Training Range, Vieques Island, Puerto Rico.*

If you have any questions regarding the attached comment responses, please don't hesitate to contact me at 757-322-4815 or by e-mail: [christopher.penny@navy.mil](mailto:christopher.penny@navy.mil)

Sincerely,

Christopher T. Penny, P.E.  
Eastern Vieques Project Coordinator  
Environmental Restoration and Support Branch  
(Vieques Restoration Section)  
Environmental Division  
NAVFAC ATLANTIC  
By direction of the Commander

*Quality Performance ... Quality Results*

March 7, 2007

Copy to:

NAVFAC ATLANTIC (Mr. Byron Brant, Mr. Kevin Cloe)

PREQB(Ms. Yarissa Martinez)

USEPA (Mr. Daniel Rodriguez)

DOI (Messrs. Oscar Díaz, Susan Silander, Félix Lopez)

CH2MHILL (Mr. John Tomik)

**NAVY'S RESPONSE TO THE COMMENTS IN EQB LETTER DATED AUGUST 03, 2006 REGARDING THE OPERATION OF THE FLASHING FURNACE ON VIEQUES AS PART OF THE TIME CRITICAL MUNITIONS REMOVAL ACTION FOR THE FORMER LIVE IMPACT AREA ON VIEQUES, PUERTO RICO.**

**EQB Comment No. 1:**

Identify the construction permits granted by the Air Quality Area for each proposed location (physical location). The emissions of the permitted emission sources for each location shall be taken into account to calculate the facility-wide potential emissions including the flashing furnace emissions.

**Navy Response to Comment No. 1:**

*Potential emissions calculations have been prepared for each of the sources that will be installed at the Central Processing Center (CPC) inside the former Vieques Naval Training Range (VNTR). A table summarizing the potential facility-wide emissions including the flashing furnace and Hammer Mill emissions is included as Attachment A to this letter. Rule 206 of the Puerto Rico General Regulations states that a location approval, construction permit or operating permit is not required for sources listed in the rule as long as potential emissions are below two tons per year (tpy) for a criteria pollutant, five tpy of a combination of criteria pollutants, or two tpy for the emission levels defined in Appendix E of the Regulations for HAP emissions, whichever is lower.*

*The potential emissions for each of the five criteria pollutants at the CPC, except NO<sub>x</sub>, are well below the two tpy requirement. In addition, the cumulative potential emissions from all criteria pollutants (including NO<sub>x</sub>) are well below the five tpy requirement. The largest source of the NO<sub>x</sub> emissions is a very commonly used construction site generator using locally available diesel fuel.*

*The VNTR is a CERCLA site and all the equipment is located at the CPC which lies inside the VNTR. CERCLA section 121(e) states that "no Federal, state, or local permit shall be required for the portion of any removal or remedial action conducted entirely on site. Neither Federal facilities nor private parties are required to obtain permits for on-site actions at CERCLA sites, but both must still comply with the substantive requirements of permit programs." Based upon this understanding and the fact that the cumulative potential emissions for all criteria pollutants and sources is well below the regulated limits, (provided in Attachment A), it is the Navy's understanding that construction permits would not be required for this effort.*

**EQB Comment No. 2:**

The potential emissions calculations shall be performed for all criteria pollutants including lead (Pb) and the emissions factors used shall be clearly identified (for example: AP-42, manufacturer's data).

**Navy Response to Comment No. 2:**

*The potential emissions calculations for each source that will be operated at the CPC are detailed in Attachment A to this letter. The only potential source of lead as a criteria pollutant would be from placing lead-containing items into the Flashing Furnace. However, the operating conditions of the Flashing Furnace for this project are not conducive to such a release. The target temperature for this project is 650° F to ensure complete flashing of the items. In addition, the maximum operating temperature range for the Flashing Furnace is 1000° F to 1600° F, which is well below the boiling point (and point of vaporization) of lead (bp = 3164° F). Therefore, lead emissions from this operation are not expected. The potential emissions calculations for each source that will be operated at the CPC are detailed in Attachment A to this letter. The only potential source of lead as a criteria pollutant would be from placing lead-containing items into the Flashing Furnace. However, the operating conditions of the Flashing Furnace for this project are not conducive to such a release. The target temperature for this project is 650° F to ensure complete flashing of the items. In addition, the maximum operating temperature range for the Flashing Furnace is 1000° F to 1600° F, which is well below the boiling point (and point of vaporization) of Lead (bp = 3164° F). Therefore, lead emissions from this operation are not expected.*

EQB Comment No. 3:

If the manufacturer's data was used as emission factors, a copy must be submitted.

*Navy Response to Comment No. 3:*

*A copy of the manufacturer's data for each of the equipment has been attached as part of Attachment A.*

EQB Comment No. 4:

The emissions results shall be expressed in tons per year.

*Navy Response to Comment No. 4:*

*All emissions results are expressed in tons per year.*